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VIA ECF

November 25, 2020

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 701
New York, NY 10007
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Allyson B. Baker

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Re: *Dilenia Paguada v. Harris Originals of NY., Inc.*, 1:20-cv-07944-LJL

**Consent Motion for Extension of Time to Respond to Complaint and for Adjournment of
December 9, 2020 Initial Pretrial Conference**

Dear Judge Liman:

Given the parties' progress in settlement negotiations to date in the above-captioned litigation, Defendant Harris Originals of NY., Inc. hereby requests, with consent from Plaintiff Dilenia Paguada, that the Court grant (1) a second extension of Defendant's time to respond to Plaintiff's Complaint by thirty (30) days, and (2) an adjournment of the parties' scheduled December 9, 2020 initial pretrial scheduling conference to a later date. The parties are hopeful that this matter will settle in short order, and that the conference will ultimately be unnecessary.

Absent an extension, Defendant's response to Plaintiff's Complaint would be due on Friday, November 27, 2020. Counsel for the parties conferred via email on Tuesday, November 24, 2020, during which discussion Plaintiff consented to the requests herein. A thirty (30) day extension would put Defendant's new deadline to respond on a holiday, Friday, December 25, 2020. Accordingly, Defendant requests that this Court set the new deadline to respond as the following Monday, December 28, 2020. One thirty (30) day extension was previously requested and granted in this matter (Dkt. #10). The parties' next scheduled appearance before the Court is the Initial Pretrial Conference, on December 9, 2020 at 10 AM (Dkt. #5).

For the reasons stated above, Defendant respectfully requests that the Court grant the relief sought herein.

GRANTED. Defendant shall respond to the
Complaint by December 28, 2020. The initial pretrial
conference is ADJOURNED to January 6, 2021 at
3:00 p.m.

Sincerely,

A handwritten signature in black ink, appearing to be "AB", written over a horizontal line.

A handwritten signature in black ink, appearing to be "L. Liman", written over a horizontal line.

LEWIS J. LIMAN
United States District Judge

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Cc: Mars Khaimov